

REC'D TN
REGULATORY AUTH.

*02 JUN 4 PM 1 21

June 3, 2002
OFFICE OF THE
EXECUTIVE SECRETARY

Via Federal Express

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re: Petition of Tennessee UNE-P Coalition to Open a Contested Case
Proceeding to declare Switching an Unrestricted Unbundled
Network Element – Docket No. 02-00207

Dear Mr. Waddell:

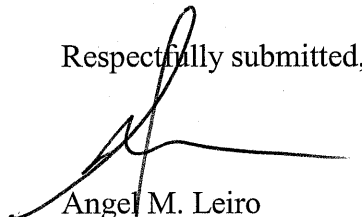
Enclosed are the original and thirteen copies of IDS Telcom, LLC's ("IDS") Responses to BellSouth's First Set of Discovery Requests propounded on IDS on May 24, 2002 in the above captioned docket.

A copy of the enclosed is being provided to counsel of record and to the parties addressed.

Kindly return a date stamped copy of this letter in the self-addressed stamped envelope provided for your convenience.

Thank you.

Respectfully submitted,



Angel M. Leiro
V-P Regulatory Affairs

Enclosure

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: Petition of Tennessee UNE-P Coalition to Open a Contested Case Proceeding to
Declare switching an Unrestricted Unbundled Network Element

Docket No. 02-00207

**IDS TELCOM, LLC'S RESPONSE TO BELL SOUTH
TELECOMMUNICATION, INC.'S FIRST SET OF DISCOVERY
REQUESTS**

Pursuant to the First report and Recommendation dated May 13, 2002, IDS Telcom, LLC
("IDS") hereby responds to BellSouth Telecommunications, Inc.'s (BellSouth") First
Discovery requests as follows:

1. IDS does not currently own or operate a switch for the provision of
telecommunications service in the State of Tennessee.
2. IDS does not currently own or operate a switch for the provision of
telecommunications service in the State of Tennessee.
3. IDS does not currently own or operate a switch for the provision of
telecommunications service in the State of Tennessee.
4. IDS does not currently own or operate a switch for the provision of
telecommunications service in the State of Tennessee.
5. No carriers have inquired regarding purchasing switching from IDS in
Tennessee.
6. IDS is not aware of any other carrier other than BellSouth that offers
switching in Tennessee.

7. IDS is not in a position to answer this question, as it has not had occasion to request collocation space in any Bellsouth central office in Tennessee.
8. IDS is not in possession or control of documents responsive to any discovery request herein.

Respectfully submitted,

IDS TELCOM, LLC.

By: 

Angel M. Leiro
V-P Regulatory Affairs
IDS Telcom, LLC
1525 NW 167th Street
Suite 200
Miami, Florida 33169

CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2002, a copy of the forgoing document was served on counsel for the known parties addressed below, via U.S. Mail.

Joelle J. Phillips, Esquire
BellSouth Telecommunications, Inc.
333 Commerce Street
Suite 2101
Nashville, TN 37201-3300

Henry Walker, Esquire
Boult, Cummings, et al.
P.O. Box 198062
Nashville, TN 37219-8062

Charles B. Welch, Esquire
Farris, Mathews, et al.
618 Church St., #300
Nashville, TN 37219

Andrew O. Isar, Esquire
ASCENT
7901 Skansie Ave., #240
Gig Harbor, WA 98335